

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:
	:
- v. -	:
	:
MIHAI IONUT PAUNESCU,	:
	:
Defendant.	:
----- X	

Protective Order re:
Attorneys' Eyes Only Material

13 Cr. 41 (LGS)

IT IS HEREBY agreed, by and between the United States of America, Damian Williams, United States Attorney, by Sarah Lai, Assistant United States Attorney, and the defendant Mihai Ionut Paunescu, by and through his attorneys Ian Marcus Amelkin and Clay Kaminsky, Assistant Federal Defenders, that, with respect to all materials designated for Attorney's Eyes Only ("AEO Material"):

(1) Defense counsel must destroy or return to the Government all AEO Material (including all copies) at the conclusion of the trial of this matter or when any appeal has become final;

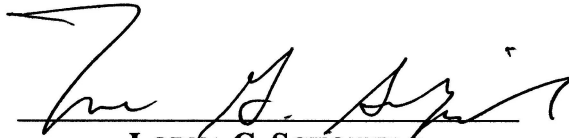
(2) AEO Material shall not be disclosed in any form, including but not limited to orally disclosing such information, to defendant Mihai Ionut Paunescu or anyone else beyond defense counsel, except that a general description of AEO Material may be provided to the defendant, any paralegal or staff employed by the defense, and any expert witness the defense intends to use at trial (collectively, "Designated Persons"). If counsel for the defendant determines that the AEO Material is material and relevant to the investigation and defense of their client and requires counsel to share the information subject to this protective order with

their client, counsel for the defendant reserve the right, on notice to the Government, to seek permission from the Court to do so.

IT IS SO ORDERED.

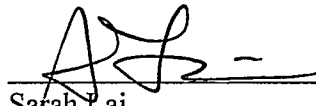
The Clerk of the Court is directed to terminate the letter motions at docket numbers 28 and 29.


Dated: September 27, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:



Sarah Lai
Assistant United States Attorney

Ian Marcus Amelkin, Esq.
Clay Kaminsky, Esq.
Counsel for Defendant Mihai Ionut Paunescu